

# EXHIBIT H

**In the Matter Of:**

**UNITED STATES OF AMERICA vs STATE OF GEORGIA**

NO. 1:16-cv-03088-ELR

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**DANTE T. MCKAY**

*January 27, 2022*

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158

1 BY MR. HOLKINS:

2 Q So we have more to discuss about Apex, but  
3 I'd like to go back and just -- so I'm going to read  
4 from what I believe is the DBHDD website you  
5 reference. I don't have a copy of it to share with  
6 you, so I'm just going to ask whether this is  
7 consistent of your recollection of what the website  
8 says. If you don't recall, that's fine and I  
9 understand.

10 The website, as I view it, reads: "Apex  
11 service cannot be provided in private chartered  
12 schools, GNETS standalone facilities, private  
13 schools or homeschools/slider public schools."

14 Is that consistent with your understanding  
15 of DBHDD's policy with respect to Apex and GNETS?

16 A Yes.

17 MS. COHEN: Patrick, if we could just take  
18 five minutes.

19 THE WITNESS: What was that?

20 MR. HOLKINS: Mr. McKay, I like to set  
21 aside those documents and show you some new  
22 ones.

23 (WHEREUPON, Plaintiff's Exhibit-15 was  
24 marked for identification.)  
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